1 2 3 4 5	MORGAN, LEWIS & BOCKIUS LLP CARRIE A. GONELL (State Bar No. 257163) cgonell@morganlewis.com JOHN D. HAYASHI (State Bar No. 211077) jhayashi@morganlewis.com ALEXANDER L. GRODAN (State Bar No. 2613 agrodan@morganlewis.com 5 Park Plaza, Suite 1750 Irvine, CA 92614 Tel: 949.399.7000 Fax: 949.399.7001 Attorneys for Defendant	374)		
7	JPMORGAN CHASE BANK, N.A.			
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10				
11	SELENA ARMAS, individually and on behalf	Case No. 3:15-cv-00607		
12	of all others similarly situated,	DECLARATION OF ALEXANDER		
13	Plaintiff, vs.	GRODAN IN SUPPORT OF DEFENDANT'S NOTICE OF		
14	JP MORGAN CHASE BANK, N.A.; and	REMOVAL		
15	DOES 1 through 50, Defendants.			
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MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
LOS ANGELES

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DECLARATION OF ALEXANDER GRODAN IN SUPPORT OF REMOVAL

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DECLARATION OF ALEXANDER GRODAN

I. Alexander Grodan, hereby declare and state as follows:

- I am a member of the California Bar and am admitted to practice before this Court. I am an associate with Morgan, Lewis & Bockius LLP, counsel of record for Defendant JPMorgan Chase Bank, N.A. ("Defendant" or "Chase"). I have personal knowledge of each of the matters set forth below, and, if called as a witness, I could and would testify to each of them under oath.
- I have reviewed the same report of PeopleSoft data containing information about 2. employees who worked as exempt Assistant Branch Managers in California between January 6, 2011, and February 4, 2015, that Linda Goldsmith reviewed in support of this removal. Based on the start and end date of each employee in the exempt Assistant Branch Manager job titles, I can estimate that these employees collectively worked in an exempt Assistant Branch Manager position in California over the course of at least 200,000 weeks between January 6, 2011, and February 4, 2015.
- Reviewing the PeopleSoft data, I have located one individual who worked in the 3. exempt Assistant Branch Manager position at some point between January 6, 2011, and February 4, 2015, who earned an hourly rate of \$10.60. This is the lowest hourly rate that I can locate in the data.
- Attached as Exhibit A is a true and correct copy of Plaintiff Selena Armas' 4. Summary Profile, a Human Resources business record that Chase provided to me. Exhibit A reflects that Plaintiff's annual salary was \$54,995.20, which is the equivalent of \$26.44 per hour (\$54,995.20 per year divided by 52 weeks in a year divided by 40 hours per week = \$26.44).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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Executed on February 6, 2015 at Irvine, California.

Alexander Grodan

EXHIBIT "A"

Summary Data

Summary Profile for Selena R Armas

Last Refreshed: Mon Dec 22 15:03:22 CST 2014

Basic Employee Information

SID, Job Code/ City,State GID/EmpiID Status Corp Title Subs Title Description Department Full/Part Location Country

E706857, Asst Vice 100012/ 741558 NOE Full-Time WM2389 San Francisco, Leave 95775M President Assistant VALLEY Noe Valley California W/Py **United States Branch Manager** Floor: 01

Personal/Current Job

Term Date Term Reason Company Class Std Hours Std Days Grade Officer Code

703 - JPMorgan Chase Bank, NA (SW) X-Std EE 40 5 502 None

Employment

Binding Arbitration HR Original Hire Current Hire Exp Return
Bank Flag Agreement Indicator Date Date

JPMC (new) Y N/A 2013-MAY-20 2013-MAY-20 >01/01/05

Department Hierarchy

Eff Date Department Hierarchy 1 Hierarchy 2 Hierarchy 3 Hierarchy 4

2013-OCT- 741558 - NOE R - Consumer & Community 034 - Consumer 041 - California 035 -

01 VALLEY Banking Banking Region SF\Oakland

Salary

Eff Date Action Reason Currency Comp Freq Comp Rate Increase Amt Change % Annual Rate ABBR Shift

2013-SEP-16 XFR USD Annual 54,995.20 0.00 0.000% 54,995.20 0.00 N/A

Assignment Pay

Eff Date End Date Action Reason FAP Amount FAP Currency

No information on file.

Performance Rating

Review Date Rating Scale Performance Rating Rating Description

2014-FEB-01 Rating Scale 3 M Meets

Education

Date Acquired Degree School Major Graduated

No information on file.

PROOF OF SERVICE

Armas v. JPMorgan Chase Bank, N.A. USDC-Northern District of CA Case No. 3:15-cv-00607

I am a resident of the State of California, County of Orange; I am over the age of eighteen years and not a party to the within action; my business address is 5 Park Plaza, Suite 1750, Irvine, California 92614.

On February 6, 2015, I served on the interested parties in this action the within document(s) entitled:

DECLARATION OF ALEXANDER GRODAN IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL

- BY FAX: by transmitting via electronic facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.; I also caused the fax machine to print such record(s) of the transmission.
- BY MAIL: by placing the document(s) listed above in a sealed [X]envelope with postage thereon fully prepaid, in the United States mail at Irvine, California addressed as set forth below. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
 - BY OVERNIGHT MAIL: By FEDERAL EXPRESS, following ordinary business practices for collection and processing of correspondence with said overnight mail service, and said envelope(s) will be deposited with said overnight mail service on said date in the ordinary course of business.
 - BY PERSONAL SERVICE: I delivered to an authorized courier or driver authorized by First Legal Support to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed with the court upon request.
 - BY ELECTRONIC SERVICE: the parties listed below were served electronically with the document(s) listed above by e-mailed PDF files on February 6, 2015. The transmission was reported as complete and without error. My electronic notification address is 5 Park Plaza, Suite 1750, Irvine, California 92614. My e-mail address is pmartin@morganlewis.com.

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BOCKIUS LLP ATTORNEYS AT LAW

1 2	[] BY E-FILE : I caused such documents to be transmitted by e-file with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:			
3	send a notice of electronic fining to the following.			
4				
5				
6	Robert Ottinger, Esq. / Ori Edelstein, Esq. Attorneys for Plaintiff THE OTTINGER FIRM, P.C. SELENA ARMAS			
7	930 Montgomery Street, #502			
8	San Francisco, CA 94133 Phone: 415.262.0096			
9	Fax: 415.520.0555			
10	robert@ottingerlaw.com ori@ottingerlaw.com			
11				
12	[X] FEDERAL: I declare that I am employed in the office of a member of the Bar of this Court at whose direction this service was made.			
13	Executed on February 6, 2015, at Irvine, Galifornia.			
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15	Patricia Martin			
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Morgan, Lewis Bockius LLP Attorneys at Law IDVINE